

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

EIJA HEWARD,
Plaintiff,

vs.

CITY OF BROCKTON
BROCKTON PUBLIC SCHOOLS AND
DONALD BURRELL, INDIVIDUALLY AND
AS PRINCIPAL OF EAST JUNIOR HIGH
SCHOOL, CITY OF BROCKTON,
Defendants.

)
)
)
) C. A. No. 04-12038-JLT

PLAINTIFF'S MOTION FOR LEAVE TO AMEND VERIFIED COMPLAINT


Pursuant to FRCP 15(a) the Plaintiff, Eija Heward, seeks leave to Amend the Verified Complaint originally filed in the United States District Court, District of Massachusetts on September 22, 2004. As grounds therefore the Plaintiff seeks to amend the Complaint to reduce the number of counts of causes of action from nine to three counts and to provide specific detail to clarify her remaining claims and requests for relief. Said Amended Verified Complaint is attached hereto.

CERTIFICATION PURSUANT TO RULE 7.1(a)(2)
SEEKING TO AMEND COMPLAINT

Pursuant to Local Rule 7.1(A)(2), Joseph R. Gallitano, the Plaintiff's attorney, conferred with Lorna M. Hebert of Murphy, Hess, Toomey & Lehane, L.L.P., the Defendants attorney on November 29, 2004 in a good faith attempt to resolve amending the Verified Complaint to reduce the number of Plaintiff's claims and request additional time to respond to Defendant's Motion to Dismiss. Counsel for the Defendants stated that she assents to the motion.

Respectfully submitted,

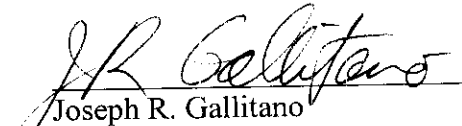
Eija Heward
By her Attorney


Joseph R. Gallitano
Gallitano & Associates
34 Main Street Ext. Suite 202
Plymouth, MA 02360
(508) 746-1500
BBO # 183700

Dated: December 15, 2004

CERTIFICATE OF SERVICE

I, Joseph R. Gallitano, Esq., hereby certify that I have served a copy of the Plaintiff's Motion for Leave to Amend Verified Complaint and Amended Verified Complaint upon all counsel of record this 15th day of December, 2004.


Joseph R. Gallitano